

ND-2014-1-C
248340

WILLKIE FARR & GALLAGHER LLP

1875 K Street, N.W.
Washington, DC 20006-1238

Tel: 202 303 1000
Fax: 202 303 2000

January 6, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

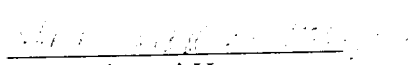
Re: Section 63.71 Discontinuance Application of tw telecom holdings inc. on Behalf of Its Affiliates

Dear Ms. Dortch:

Pursuant to Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, enclosed is the application of **tw telecom holdings inc.** on behalf of its affiliates to discontinue the Integrated Business Line service in the states where the service is offered. Notice of the planned discontinuance is being filed under separate cover with the International Bureau pursuant to Section 63.19 of the Commission's rules, 47 C.F.R. § 63.19.

Please contact the undersigned with any questions regarding this application.

Respectfully submitted,


Mia Guizzetti Hayes
Daniel R. Bumpus

Counsel for tw telecom holdings inc.

cc: Arizona Corporation Commission
Governor Janice K. Brewer
California Public Utilities Commission
Governor Jerry Brown
Colorado Public Utilities Commission
Governor John W. Hickenlooper
Florida Public Service Commission
Governor Rick Scott
Georgia Public Service Commission
Governor Nathan Deal
Hawaii Public Utilities Commission

January 6, 2014

Page 2

Governor Neil Abercrombie
Idaho Public Utilities Commission
Governor Butch Otter
Indiana Utility Regulatory Commission
Governor Mike Pence
Kentucky Public Service Commission
Governor Steve Beshear
Minnesota Public Utilities Commission
Governor Mark Dayton
North Carolina Utilities Commission
Governor Pat McCrory
New Jersey Board of Public Utilities
Governor Chris Christie
New Mexico Public Regulation Commission
Governor Susana Martinez
New York State Public Service Commission
Governor Andrew M. Cuomo
Public Utilities Commission of Ohio
Governor John R. Kasich
Public Service Commission of South Carolina
Governor Nikki Haley
Tennessee Regulatory Authority
Governor Bill Haslam
Public Utility Commission of Texas
Governor Rick Perry
Washington Utilities and Transportation Commission
Governor Jay Inslee
Secretary of Defense, Attn. Special Assistant for Telecommunications
Mindel De La Torre

cc (via email): Rodney McDonald
Carmell Weathers
Kimberly Jackson

Enclosure

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Application of)
tw telecom holdings inc.) WC Docket No. ____
On Behalf of Its Affiliates)
For Authority Pursuant to Section 63.71)
Of the FCC's Rules, 47 C.F.R. § 63.71,)
To Discontinue the Integrated Business)
Line Service)

**SECTION 63.71 APPLICATION OF TW TELECOM HOLDINGS INC.
ON BEHALF OF ITS AFFILIATES**

On behalf of the following of its wholly-owned affiliates, **tw telecom holdings inc.** ("tw telecom"), a wholly-owned direct subsidiary of **tw telecom inc.**, requests authority under Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, to discontinue the Integrated Business Line ("IBL") service in the states where it is offered:¹

tw telecom of arizona llc
tw telecom of california l.p.
tw telecom of colorado llc
tw telecom of florida l.p.
tw telecom of georgia l.p.
tw telecom of hawaii l.p.
tw telecom of idaho llc
tw telecom of indiana l.p.
tw telecom of kentucky llc
tw telecom of minnesota llc
tw telecom of north carolina l.p.
tw telecom of new jersey l.p.
tw telecom of new mexico llc
tw telecom of new york l.p.
tw telecom of ohio llc
tw telecom of south carolina llc
tw telecom of tennessee llc

¹ The IBL service is offered in: Arizona, California, Colorado, Florida, Georgia, Hawaii, Idaho, Indiana, Kentucky, Minnesota, North Carolina, New Jersey, New Mexico, New York, Ohio, South Carolina, Tennessee, Texas, and Washington.

tw telecom of texas llc
tw telecom of washington llc

Notice of the proposed discontinuance is being filed simultaneously with the International Bureau pursuant to Section 63.19 of the Commission's rules, 47 C.F.R. § 63.19.

As required by Sections 63.71(a) and (b) of the Commission's rules, **tw telecom** provides the following information in support of its discontinuance request:

Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):

tw telecom and its affiliates may be contacted at the following addresses:

Customer Care, Network Operations Center
2342 Technology Drive, Summit 1
O'Fallon, MO 63368

Corporate Headquarters
10475 Park Meadows Drive
Littleton, CO 80124

Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)) and Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

tw telecom's affiliates intend to discontinue the IBL service in the states where the service is offered on or after March 10, 2014, subject to Commission authorization to discontinue the service pursuant to 47 C.F.R. § 63.71(c).

Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

IBL service packages bundle voice and Internet services with discounted pre-packaged long distance plans. Package voice channels may be lines or analog or digital trunks. Customers may mix voice and Internet channels in any manner they choose.

Brief Description of the Date and Method of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):

tw telecom notified its affected customers of the planned discontinuance of the IBL service by letter sent via U.S. mail on January 6, 2014. A copy of the customer notification letter is appended hereto as Attachment A. The letter informs affected customers that, with the

required FCC approval, **tw telecom** plans to discontinue the IBL service on or after March 10, 2014.

Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

tw telecom's affiliates are considered non-dominant carriers in their provision of IBL service.

Other Information (47 C.F.R. § 63.71(b)(5)):

Copies of this application are being sent via First-Class U.S. Mail to the Public Service Commissions and Governors of each state where the IBL service is provided and to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

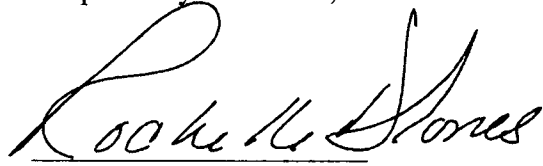
Please direct questions regarding this application to:

Mia Guizzetti Hayes
Willkie Farr & Gallagher LLP
1875 K Street, N.W.
Washington, DC 20006
(202) 303-1197
mhayes@willkie.com

Conclusion:

The public convenience and necessity will not be adversely affected by the discontinuance of **tw telecom's** IBL service. All affected customers have been given notice that affords them ample time to acquire reasonable substitute services, which are readily available and include, but are not limited to, other services offered by affiliates of **tw telecom**. Therefore, **tw telecom** respectfully requests that the Commission approve this Section 63.71 application to discontinue the IBL service in the states where it is offered.

Respectfully submitted,

A handwritten signature in black ink, reading "Rochelle D. Jones". The signature is written in a cursive style with a large initial "R" and "D".

Rochelle D. Jones
Vice President – Regulatory
tw telecom inc.

Dated: January 6, 2014

Attachment A



tw telecom holdings inc.
Customer Care
2342 Technology Drive
Summit 1
O'Fallon, MO 63368

Insert Billing Contact Name
Insert Company Name
Insert Billing Address 1
Insert Billing Address 2
Insert Billing City, State Zip

Date: January 6, 2014

Regarding: IBL service at Service Address:

**Important Notice Regarding Discontinuance of IBL Service
Provided by Affiliates of tw telecom**

Dear Customer,

Previously, we notified you that your contract with an affiliate of **tw telecom holdings inc. ("tw telecom")**¹ for Integrated Business Line ("IBL") service would expire.

At that time, we allowed you to continue to use the service as long as you did not require any modifications or additions to the service. Now the time has come for **tw telecom** to begin the process of removing the outdated equipment supporting the IBL service from our network.

This letter serves as formal notice that, on or after March 10, 2014, and subject to the approval of the Federal Communications Commission ("FCC"), **tw telecom** plans to discontinue the IBL service. Thus, on or after March 10, 2014, the IBL service will no longer be available at the above-referenced location.

We would like to work with you to migrate your service to the Converged Services platform currently offered by **tw telecom**. The Converged Services platform is based on the latest equipment and communications technology. The Converged Services platform allows customers to fully integrate Voice (analog lines, PRI, digital trunks) with Data (VPN) and/or Internet and Security services on a single connection. Data, Internet, and Voice services dynamically share all bandwidth, and voice traffic is always prioritized over data traffic.

In order to maintain continuous service at your location, by March 10, 2014 or the date on which the FCC approves the planned discontinuance of the IBL service, we will need to either migrate your service to another **tw telecom** service that will best benefit your business or move your service to another telecommunications service provider.

If you have not made arrangements with tw telecom or another telecommunications service provider to replace your IBL service, please be advised that your service will be disconnected on or after March 10, 2014.

¹ The affiliates of **tw telecom** that offer the IBL service are: tw telecom of arizona llc, tw telecom of california l.p., tw telecom of colorado llc, tw telecom of florida l.p., tw telecom of georgia l.p., tw telecom of hawaii l.p., tw telecom of idaho llc, tw telecom of indiana l.p., tw telecom of kentucky llc, tw telecom of minnesota llc, tw telecom of north carolina l.p., tw telecom of new jersey l.p., tw telecom of new mexico llc, tw telecom of new york l.p., tw telecom of ohio llc, tw telecom of south carolina llc, tw telecom of tennessee llc, tw telecom of texas llc, and tw telecom of washington llc.

If you wish to contact me to discuss Converged Services or another service offering from **tw telecom**, you may do so at the number or email provided below.

If you also subscribe to other services from **tw telecom**, those services will NOT be impacted by the anticipated discontinuance of the IBL service. Your other services will remain in place with no change to the applicable rates, terms, or conditions.

We sincerely regret any inconvenience this may cause you and your organization, but we look forward to continuing our relationship and providing a new service that meets your telecommunications needs. **tw telecom** is dedicated to providing the finest business communications services and customer care available, allowing you to focus on your business. Please contact me as soon as possible to talk about **tw telecom**'s Converged Services platform or our other communications solutions that may best meet your needs. If we do not receive communication from you, we will plan to disconnect your service on or after March 10, 2014, subject to regulatory approval.

Sincerely,

Account Rep Name
Account Rep Title
tw telecom
Account Rep Phone
Account Rep email

tw telecom is required by the FCC to provide the following statement:

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of tw telecom holdings inc. on Behalf of Its Affiliates. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

CERTIFICATE OF SERVICE

I, Daniel R. Bumpus, do hereby certify that on this day, January 6, 2014, I caused to be served a true and correct copy of the foregoing Section 63.71 application of **tw telecom holdings inc.** on Behalf of Its Affiliates via First-Class U.S. Mail, postage prepaid, to the following:

Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007
(602) 542-2237

Governor Janice K. Brewer
Executive Tower
1700 West Washington Street
Phoenix, AZ 85007
(602) 542-4331

California Public Utilities Commission
California State Building
505 Van Ness Avenue
San Francisco, CA 94102-3298
(415) 703-2782

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814
(916) 445-2841

Colorado Public Utilities Commission
1560 Broadway, Suite 250
Denver, CO 80202
(303) 894-2000

Governor John W. Hickenlooper
136 State Capitol
Denver, CO 80203-1792
(303) 866-2471

Florida Public Service Commission
2540 Shumard Oak Blvd
Gerald Gunter Building
Tallahassee, FL 32399
1 (800) 342-3552

Governor Rick Scott
The Capitol
400 South Monroe Street
Tallahassee, FL 32399-0001
(850) 488-7146

Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334
(404) 656-4501

Governor Nathan Deal
206 Washington Street
Suite 203, State Capitol
Atlanta, GA 30334
(404) 656-1776

Hawaii Public Utilities Commission
465 South King Street
Kekuanao'a Building
Room 103
Honolulu, HI 96813
(808) 586-2020

Governor Neil Abercrombie
Executive Chambers, State Capitol
Honolulu, HI 96813
(808) 586-0034

Idaho Public Utilities Commission
472 West Washington Street
PO Box 83720
Boise, ID 83720-0074
(208) 334-0300

Governor Butch Otter
State Capitol
PO Box 83720
Boise, ID 83720
(208) 334-2100

Indiana Utility Regulatory Commission
PNC Center
101 West Washington Street
Suite 1500 East
Indianapolis, IN 46204
(317) 232-2701

Governor Mike Pence
Statehouse
Indianapolis, IN 46204-2797
(317) 232-4567

Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0615
(502) 564-3940

Governor Steve Beshear
700 Capitol Avenue, Suite 100
Frankfort, KY 40601
(502) 564-2611

Minnesota Public Utilities Commission
121 Seventh Place East
Suite 350
St. Paul, MN 55101-2147
(651) 296-7124

Governor Mark Dayton
130 State Capitol
75 Rev. Dr. Martin Luther King Jr. Blvd
St. Paul, MN 55155
(651) 201-3400

North Carolina Utilities Commission
430 North Salisbury Street
Raleigh, NC 27603-5918
(919) 733-4249

Governor Pat McCrory
20301 Mail Service Center
Raleigh, NC 27699-0301
(919) 814-2000

New Jersey Board of Public Utilities
44 South Clinton Ave
PO Box 350
Trenton, NJ 08625-0350
(609) 777-3300

Governor Chris Christie
PO Box 001
Trenton, NJ 08625
(609) 292-6000

New Mexico Public Regulation Commission
1120 Paseo de Peralta
Santa Fe, NM 87501-1269
1 (888) 427-5772

Governor Susana Martinez
490 Old Santa Fe Trail, Room 400
Santa Fe, NM 87501
(505) 476-2200

New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350
(518) 474-7080

Governor Andrew M. Cuomo
NYS State Capitol Building
Albany, NY 12224
(518) 474-8390

Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793
(614) 466-3016

Governor John R. Kasich
Riffe Center, 30th Floor
77 South High Street
Columbus, OH 43125-6117
(614) 466-3555

Public Service Commission of South Carolina
101 Executive Center Drive
Suite 100
Columbia, SC 29210
(803) 896-5100

Governor Nikki Haley
Office of the Governor
1205 Pendleton Street
Columbia, SC 29201
(803) 734-2100

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243
(615) 741-2904

Governor Bill Haslam
First Floor, State Capitol
Nashville, TN 37243
(615) 741-2001

Public Utility Commission of Texas
1701 North Congress Ave
Austin, TX 78701-3326
(512) 936-7000

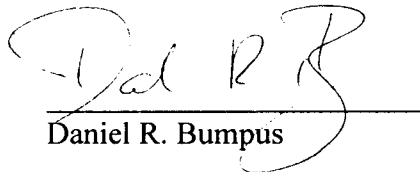
Governor Rick Perry
PO Box 12428
Austin, TX 78711-2428
(512) 463-2000

Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive
PO Box 47250
Olympia, WA 98504-7250
(360) 664-1160

Governor Jay Inslee
PO Box 40002
Olympia, WA 98504-0002
(360) 902-4111

Secretary of Defense
Attn: Special Asst. for Telecommunications
Pentagon
Washington, DC 20301
(703) 571-3343

Mindel De La Torre
Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
(202) 418-0437



Daniel R. Bumpus